

THE HONORABLE RONALD B. LEIGHTON

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

UNITED STATES OF AMERICA,)	Case No. CR18-5579RBL
)	
Plaintiff,)	
)	DEFENDANT MONIQUE GREEN'S MOTION
v.)	TO JOIN DEFENDANT LOPEZ-
)	HERNANDEZ'S MOTION AND
MONIQUE GREEN,)	MEMORANDUM OF LAW IN SUPPORT OF
)	RECONSIDERATION OF PROPOSED
Defendant.)	SCHEDULING ORDER (DKT. 417)

Defendant Monique Green, through counsel, requests that the Court permit her to join in the motion filed by codefendant Lopez-Hernandez seeking reconsideration of the proposed scheduling order. Dkt. #417. She respectfully asks the Court to either vacate the current scheduling order and set a deadline for the parties to propose alternatives to the Government's requested dates, or alternatively to modify the scheduling order to require the Government to complete production of *Jencks*, *Giglio* and Rule 26.2 discovery no later than Friday, August 16, 2019. She further asks the Court to order the Government to produce all non-*Brady* confidential informant discovery no later than Monday, June 17, 2019.

Through counsel, Ms. Green has formally requested discovery from the Government by way of a letter dated December 10, 2018 which included requests for all Brady and Giglio and Rule 26.2 materials. She previously had emailed the attorneys for the United States indicating that she was requesting Jencks, Giglio and Rule 26.2 materials as to cooperating sources and informants no later than six weeks prior to the trial date.

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1 Defendant Green thanks this Court for setting an earlier deadline for the Government to
3 produce Jencks, Giglio and Rule 26.2 material as to cooperating sources and informants of
5 September 3, 2019, than that requested by the Government of September 13, 2019, in its
7 Complex Case Management Order. Dkt. #411. She respectfully submits that the Court's
9 deadline will not provide sufficient time for defense to investigate and respond to these materials
11 prior to the current trial. She submits that the earlier date is required in order for counsel to
13 render effective assistance to Ms. Green. She agrees with and adopts the arguments set forth in
15 defendant Lopez-Hernandez's memorandum of law in support of his motion and requests the
17 relief that he seeks.

19 In conclusion, she moves the Court to permit her to join in defendant Lopez-Hernandez's
21 motion and memorandum of law concerning these deadlines. Dkt. #417.

23 DATED this 22nd day of February, 2019.

25 Respectfully submitted,

27 s/Catherine Chaney
29 Catherine Chaney, WSBA No. 21405
31 Defendant Green's Attorney
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39 CERTIFICATE OF SERVICE

41 I, Catherine Chaney, declare that I file the foregoing with the Clerk of the Court, using the
43 CM/ECF system, which will provide notice to all parties.

45 Dated this 22nd day of February, 2019.

47 s/Catherine Chaney
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